



BOULT • CUMMINGS
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REC'D TN
REGULATORY AUTHORITY

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June 13, 2002 02 JUN 13 PM 4 23

OFFICE OF THE
EXECUTIVE SECRETARY

Mr. David Waddell
Executive Secretary
Tennessee Regulatory Authority
360 James Robertson Parkway
Nashville, TN 37201

Re: Petition of Global Tel*Link Corporation for a One-Time
Waiver of TRA Rule 1220-4-2-.58(2)(e)
Docket No. 02-00700

Dear David:

Enclosed herewith are the original and thirteen copies of a Petition filed on behalf of Global Tel*Link Corporation for a one time waiver of TRA Rule 1220-4-2-.58(2)(e). A \$25.00 filing fee is also enclosed.

As described in the Petition, Global Tele*Link seeks a one-time waiver of a TRA rule which prohibits a carrier from billing calls after ninety days. Global Tel*Link has served copies of the request on both BellSouth, the carrier responsible for billing Global Tel*Link calls, and to the Consumer Advocate Division. Counsel for Global has also personally contacted those offices to alert them to the filing of this request.

If the Authority can act on this matter on June 18, 2002, these unbilled calls can be sent to customers before the end of June. Otherwise, another month will pass before the bills are rendered, increasing the financial hardship to Global Tel*Link.

Therefore, Global Tel*Link requests that this waiver Petition – which the Company believes will be unopposed – be placed on the conference agenda for June 18, 2002.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By:

Henry Walker

HW/nl

c: Guy Hicks, BellSouth Telecommunications, Inc.
Tim Phillips, Attorney General's Office

Enclosure

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6/13/2002

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**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE: PETITION OF GLOBAL)
TEL*LINK CORPORATION FOR A ONE-) DOCKET NO. _____
TIME WAIVER OF TRA RULE 1220-4-2-)
.58(2)(e))

**PETITION OF GLOBAL TEL*LINK CORPORATION
FOR A ONE TIME WAIVER OF TRA RULE 1220-2-.58(2)(e)**

Global Tel*Link Corporation ("GTL") petitions the Tennessee Regulatory Authority ("TRA"), pursuant to rule 1220-1-1-.05, to grant a one time waiver of Rule 1220-4-2-.58(2)(e) which prohibits billing domestic calls after more than ninety days.¹

GTL operates in Tennessee as a provider of coin telephone service under the jurisdiction of the TRA. GTL primarily offers service to inmates. GTL has a billing services agreement with BellSouth Telecommunications, Inc. ("BellSouth"). When an inmate makes a collect call to a BellSouth subscriber, BellSouth bills the called party on behalf of GTL.

In January, 2002, GTL submitted to BellSouth records of calls made in December, 2001, and January 2002. As a result of a computer error and misunderstandings between GTL and BellSouth, these calls were not billed. After an extensive investigation by GTL and numerous communications between GTL and BellSouth, GTL resubmitted the call records to BellSouth. Although both carriers have now verified that the call records are correct and should be billed, BellSouth has informed GTL that BellSouth is unable to bill the calls because more than ninety days have passed since the calls were made. The value of these unbilled calls is \$414,753.63. GTL will incur severe financial hardship if these calls are not billed. Therefore, GTL requests

¹ GTL is filing similar petitions in Louisiana and Alabama which also have ninety-day deadlines. The billing deadlines for other states in the region are: South Carolina, 6 months; Florida, 12 months; Kentucky, 2 years; North Carolina, 3 years. There are no deadlines in Mississippi and Georgia.

that the TRA grant a one-time waiver of Rule 1220-4-2-.58(2)(e) so that BellSouth will bill these calls. The TRA is authorized to grant a waiver "for good cause shown" of any TRA rule. See Rule 1220-1-1-.05.

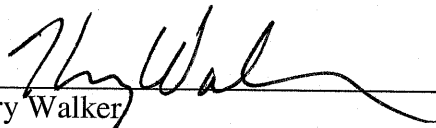
Based on guidance from the TRA Consumer Services Division, GTL has agreed to provide notice to all customers of the delayed billings. The notice will be provided by means of a bill insert. The notice will explain that the bill includes calls made in December, 2001, and January 2002, and that customers wishing to make payment arrangements may contact GTL at a toll-free number. GTL will insure that such requests are handled promptly and appropriately.

Because any further delay in billing these calls will create an additional hardship on both GTL and its customers, GTL asks that this matter be placed on the TRA's next public agenda and that this one-time waiver be granted.²

Respectfully submitted,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: _____


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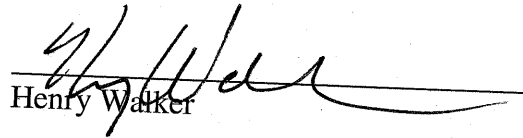
² On June 14, 2002, GTL will file an affidavit from a corporate official verifying the contents of this Petition.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded via fax or hand delivery and U.S. mail to the following on this the 13th day of June, 2002.

Guy Hicks, Esq.
BellSouth Telecommunications, Inc.
333 Commerce St., Suite 2101
Nashville, TN 37201-3300

Tim Phillips, Esq.
Office of the Attorney General
Consumer Advocate and Protection Division
P.O. Box 20207
Nashville, TN 37202


Henry Walker